

# BRAVERMAN | GREENSPUN

A PROFESSIONAL CORPORATION

February 19, 2021

**Via ECF**

Honorable Debra C. Freeman  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

SO ORDERED

The within request for leave to submit letter briefing under seal is granted.

The Clerk of Court is directed to mail a copy of this Order to Plaintiffs.

  
DEBRA FREEMAN  
United States Magistrate Judge

Dated: 2/24/2021

**Re: *Wood, et al. v. Mutual Redevelopment Houses, Inc., et al.***  
**USDC SDNY Case No. 19-CV-9563 (AT) (DCF)**

Dear Judge Freeman:

We represent defendants Mutual Redevelopment Houses, Inc. (“Mutual”), Carmen Santiago and Brendan Keany (the “Mutual Defendants”), and write with respect to Your Honor’s Order dated February 18, 2021 (ECF 53), and in particular, Your Honor’s direction that we submit letter briefing regarding whether the medical condition that Mr. Wood claims should remain under seal.

In such letter briefing, we anticipate that we will need to argue that the nature of the particular medical condition Mr. Wood claims does not warrant an exception from the presumption of public access to judicial documents set forth in *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119-20 (2d Cir. 2006). Such argument would, of necessity, disclose the medical condition at issue.

To prevent any potential prejudice, we are requesting permission pursuant to the Section IV(A)(ii) of the Individual Practices of Judge Torres to file, on the public docket, a version of our letter brief with references to the medical condition redacted, with an unredacted version filed under seal.

We thank the Court for its consideration.

Respectfully,

/s/ William J. Geller

William J. Geller

cc: Tzvee Wood  
Andrea Malester  
271 Magnolia Boulevard  
Long Beach, New York 11561

**CERTIFICATE OF SERVICE**

WILLIAM J. GELLER, an attorney admitted to practice before this Court certifies that I caused the within Letter to Honorable Debra C. Freeman Re: Wood, et al. v. Mutual Redevelopment Houses, Inc., et al., USDC SDNY Case No. 19-CV-9563 (AT) (DCF) to be served by first class mail on the date hereof upon:

Tzvee Wood  
271 Magnolia Boulevard  
Long Beach, New York 11561

Andrea Malester  
271 Magnolia Boulevard  
Long Beach, New York 11561

Dated: February 19, 2021

**BRAVERMAN GREENSPUN, P.C.**

By: /s/ William J. Geller  
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